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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

EXXON MOBIL CORPORATION,

Petitioner/Plaintiff,

v.

SANTA BARBARA COUNTY
BOARD OF SUPERVISORS,

Respondent/Defendant,

and

ENVIRONMENTAL DEFENSE
CENTER, GET OIL OUT!, SANTA
BARBARA COUNTY ACTION
NETWORK, SIERRA CLUB,
SURFRIDER FOUNDATION,
CENTER FOR BIOLOGICAL
DIVERSITY, and WISHTOYO
FOUNDATION,

Proposed Defendant-
Intervenors.

Case No. 2:22-cv-03225(DMG MRWx)

**DECLARATION OF KEN HOUGH
IN SUPPORT OF MOTION TO
INTERVENE**

Hon. Dolly Gee

Hearing: October 21, 2022

Time: 9:30 a.m.

Place: Courtroom 8C,
350 West 1st Street, Los Angeles

1 I, Ken Hough, declare as follows:

2 1. My name is Ken Hough. I am over 18 years old. I have personal
3 knowledge of the following facts and if called as a witness, would testify to these
4 facts under oath.

5 2. I currently live in Santa Maria, California, and have lived in Santa
6 Barbara County for 11 years.

7 3. I have been a member of Santa Barbara County Action Network
8 (SBCAN) for 11 years. Initially I was a member for a few months, then a Board
9 Member for a few months, then was hired as Executive Director, starting August
10 1, 2012, and continuing to this day.

11 4. For 20 years SBCAN has worked to promote social and economic
12 justice, to preserve our environmental and agricultural resources and to create
13 sustainable communities. We are a membership organization, with dues-paying
14 members from throughout the County. We have always focused on the need to
15 transition to clean energy and have sought to protect our environmental resources
16 and residents from the hazardous consequences of oil and gas production.

17 5. I would be personally impacted by the proposed project if it is
18 approved. Whenever I leave my neighborhood I see crude oil tankers on
19 Highway 101. Sometimes I take Route 166 enroute to San Joaquin Valley or just
20 to go along the Cuyama River for nature photography. I always see crude oil
21 tankers there and I would see many more if this project was approved. I know
22 how real the danger is and get well off the road for photography.

23 6. I am concerned about climate change and believe that further oil and
24 gas development will exacerbate climate change.

25 7. I am concerned that the proposed project will exacerbate climate
26 change through the restart of offshore production and that the project will make
27 travel along Highway 101 and Route 166 more dangerous.

1 8. The proposed project runs counter to SBCAN's mission of
2 preserving our environmental resources and creating sustainable communities.

3 9. I often travel along Route 166 and Highway 101, and from my
4 personal experience driving on these roads, I do not think they can support the
5 additional traffic of large oil tankers traveling every day on them. These roads are
6 already dangerous—and I would worry about my safety, and the safety of the
7 natural environment, if the project was allowed to proceed. The crash of a tanker
8 truck two years ago, spilling over 4,000 gallons of crude oil into the Cuyama
9 River, is but one example of the risks involved with this proposal.

10 10. In response to this proposed project I have attended informational
11 meetings, written letters, discussed the proposal with friends, family, and
12 neighbors, and have attended rallies and testified at hearings.

13 11. SBCAN has been represented by the Environmental Defense Center
14 ("EDC") during the County's environmental and administrative review processes
15 for ExxonMobil's proposed project. EDC wrote comment letters on behalf of
16 SBCAN regarding the Environmental Impact Report, Planning Commission
17 hearings, and Board of Supervisors hearing. SBCAN also submitted an additional
18 letter to the Board of Supervisors and signed onto group comment letters to the
19 Planning Commission and Board of Supervisors.

20 12. SBCAN has sent action alerts to its email list of 1,200, urging people
21 to speak out against approval of this proposal.

22 13. SBCAN seeks to intervene in ExxonMobil's lawsuit challenging the
23 County's denial of its trucking proposal. SBCAN members' interests and my
24 personal and professional interests are specifically threatened because the
25 proposed oil trucking would increase the risk of oil spills, harm to wildlife,
26 waters, and cultural resources, and lead to more accidents. A court order
27 upholding Santa Barbara County's decision will ensure the safety of SBCAN's
28 members and protection of the environment and would make me feel personally

1 much safer. If the decision is not upheld, people and ecosystems will be put at
2 considerable risk from traffic accidents and oil spills, which would decrease my
3 own use and enjoyment of the area.

4 I declare under penalty of perjury that the foregoing is true and correct to
5 the best of my knowledge, information, and belief.

6 Executed at Santa Maria, California, on August 8, 2022.

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10 **Ken Hough**
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